



**NITCO**  
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205 N Washington Street | P. O. Box 67 | Hebron, Indiana 46341 | [www.nitco.com](http://www.nitco.com)

REDACTED – FOR PUBLIC INSPECTION

VIA ECFS

June 28, 2017

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

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RE: Northwestern Indiana Telephone Company, Inc. 320800  
**Submission of FCC Form 481 Annual Report**  
**WC Docket No. 14-58 – ETC Annual Reports and Certifications**

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Northwestern Indiana Telephone Company, Inc., (“the Company”), Study Area Code 320800, hereby files its FCC Form 481 – Carrier Annual Reporting Data Collection Form. *The version of the Company’s FCC Form 481 submitted via the FCC’s Electronic Comment Filing System (ECFS) is a redacted version of the filing that contains no confidential information.*

Section 3005 of FCC Form 481 requires privately-held rate-of-return carriers receiving high cost support to attach a full and complete annual report of the company’s financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Northwestern Indiana Telephone Company, Inc., by its authorized representative, hereby seeks confidential treatment of its financial annual report pursuant to the March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58.<sup>1</sup> The *Protective Order* specifically covers the information required by 47 C.F.R. §54.313(f)(2).

Northwestern Indiana Telephone Company, Inc., is providing to the Office of the Secretary, under seal, this cover letter and the FCC Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

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<sup>1</sup> *Connect America Fund, ETC Annual Reports and Certifications*, WC Docket Nos. 10-90 and 14-58, Protective Order, 31 FCC Rcd 2089 (2016).

Each page of the Company's financial annual report and the financial summary page on the FCC Form 481 bear the legend, "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

In the filing submitted via the ECFS, all pages containing confidential information bear the legend "REDACTED – FOR PUBLIC INSPECTION."

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

The FCC Form 481 has also been filed with the relevant state commissions and Tribal governments, as appropriate.

Please contact me if you have any questions.

Sincerely,



Thomas C Long  
President/COO  
Northwestern Indiana Telephone Company, Inc.

\_/kr

CC: Executive Secretary – Indiana Utility Regulatory Commission

<010> Study Area Code	320800
<015> Study Area Name	NORTHWESTERN INDIANA
<020> Program Year	2018
<030> Contact Name: Person USAC should contact with questions about this data	Sharon L McKay
<035> Contact Telephone Number: Number of the person identified in data line <030>	2199962981 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	smckay@nitco.com
Form Type	54.313 and 54.422



**(300) Unfulfilled Service Request  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	320800
<015> Study Area Name	NORTHWESTERN INDIANA
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Sharon L McKay
<035> Contact Telephone Number - Number of person identified in data line <030>	2199962981 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	smckay@nitco.com

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice) \_\_\_\_\_  
Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband) \_\_\_\_\_  
Name of Attached Document

(400) Number of Complaints per 1,000 customers  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	320800
<015>	Study Area Name	NORTHWESTERN INDIANA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Sharon L McKay
<035>	Contact Telephone Number - Number of person identified in data line <030>	2199962981 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	smckay@nltco.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

**[500] Compliance With Service Quality Standards and Consumer Protection Rules  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	320400
<015> Study Area Name	NORTHWESTERN INDIANA
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Sharon L McKay
<035> Contact Telephone Number - Number of person identified in data line <030>	219962981 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	smckay@nitco.com
<500> Certify compliance with applicable service quality standards and consumer protection rules	Yes
	320800in510.pdf
<510> Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515> Certify compliance with applicable minimum service standards	

**(600) Functionality in Emergency Situations  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	320800
<015> Study Area Name	NORTHWESTERN INDIANA
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Sharon L McKay
<035> Contact Telephone Number - Number of person identified in data line <030>	2199962981 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	smckay@itc.com
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	320800in610.pdf







<b>(900) Tribal Lands Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	320800
<015> Study Area Name	NORTHWESTERN INDIANA
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Sharon L McKay
<035> Contact Telephone Number - Number of person identified in data line <030>	2199962981 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	smckay@nitco.com

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	320800
<015>	Study Area Name	NORTHWESTERN INDIANA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Sharon L McKay
<035>	Contact Telephone Number - Number of person identified in data line <030>	2199962981 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	smckay@nitco.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 320800in1010.pdf

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Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 320800in1030.pdf

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Name of Attached Document

<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	320800
<015> Study Area Name	NORTHWESTERN INDIANA
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Sharon L McKay
<035> Contact Telephone Number - Number of person identified in data line <030>	2199962981 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	smckay@nitco.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b> Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	320800
<015>	Study Area Name	NORTHWESTERN INDIANA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Sharon I. McKay
<035>	Contact Telephone Number - Number of person identified in data line <030>	2199962981 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	smckay@nitco.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP [www.nitco.com/lifeline](http://www.nitco.com/lifeline)

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

<b>(2005) Price Cap Carrier Additional Documentation</b>	FCC Form 481
<b>Data Collection Form</b>	OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	July 2013

<b>&lt;010&gt;</b>	Study Area Code	320800
<b>&lt;015&gt;</b>	Study Area Name	NORTHWESTERN INDIANA
<b>&lt;020&gt;</b>	Program Year	2018
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Sharon L McKay
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	2199962981 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	smckaysnitco.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

<b>&lt;2011&gt;</b>	3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.		<input style="width: 100%;" type="text"/>
<b>&lt;2022&gt;</b>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.		<input style="width: 100%;" type="text"/>
<b>&lt;2023&gt;</b>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.		<input style="width: 100%;" type="text"/>
<b>&lt;2024A&gt;</b>	Round 2 Recipient of Incremental Support?	<input style="width: 100%;" type="text"/>	<input style="width: 100%; height: 40px;" type="text"/>
<b>&lt;2024B&gt;</b>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	
<b>&lt;2025A&gt;</b>	Round 2 Recipient of Incremental Support?	<input style="width: 100%;" type="text"/>	<input style="width: 100%; height: 40px;" type="text"/>
<b>&lt;2025B&gt;</b>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	
<b>&lt;2015&gt;</b>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		<input style="width: 100%;" type="text"/>

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing  
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

<010>	Study Area Code	320800
<015>	Study Area Name	NORTHWESTERN INDIANA
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<030>	Contact Name - Person USAC should contact regarding this data	Sharon L. McKay
<035>	Contact Telephone Number - Number of person identified in data line <030>	2199962981 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	smkay@nitco.com

**4005 Rural Broadband Experiment**

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

**Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)**

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

**Community Anchor Institutions – FCC 14-98 (paragraph 79)**

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

**4003b.** Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information \_\_\_\_\_

**Broadband Deployment Locations – FCC 14-98 (paragraph 80)**

**4004a.** Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481. Name of Attached Document Listing Required Information \_\_\_\_\_

**4004b.** Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area. Name of Attached Document Listing Required Information \_\_\_\_\_

**Certification - Reporting Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010> Study Area Code	320800
<015> Study Area Name	NORTHWESTERN INDIANA
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Sharon L McKay
<035> Contact Telephone Number - Number of person identified in data line <030>	2199962981 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	smckay@nitco.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	NORTHWESTERN INDIANA
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/29/2017
Printed name of Authorized Officer:	Thomas Long
Title or position of Authorized Officer:	President/COO
Telephone number of Authorized Officer:	2199962981 ext.
Study Area Code of Reporting Carrier:	320800 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	320800
<015> Study Area Name	NORTHWESTERN INDIANA
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Sharon L McKay
<035> Contact Telephone Number - Number of person identified in data line <030>	2199962981 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	smckay@nitco.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## **Attachments**

Northwestern Indiana Telephone Co., Inc. (NITCO)  
Study Area 320800

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) NITCO, is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. NITCO also provides CPNI training to all of its new employees and has yearly refresher training for other employees. NITCO also conducts subscriber outreach regarding CPNI by periodically placing CPNI explanation messages onto its website informing subscribers on CPNI rules and regulations. All company employees are required to sign and acknowledge that they have completed CPNI training and understand obligations to adherence of applicable rules.

NITCO outlines its rates, terms, and conditions under which NITCO offers service in its Local Exchange Service Catalog. The Catalog explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. NITCO keeps a copy of these documents available for public inspection at its business offices.

Northwestern Indiana Telephone Co., Inc. (NITCO)  
Study Area Code: 320800

**Functionality in Emergency Situations:**

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) NITCO meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to Hebron central office by use of a fixed generator and batteries that provide it with 10 hours of emergency power. In addition, NITCOs field electronics have 12 hours of back-up power by use of fixed & mobile generators and batteries. NITCO also has SONET and ERPS technology deployed in its core fiber optic networks that is are self-healing and will automatically reroute traffic should a fiber cut occur. In addition NITCO has connectivity to the LATA Tandem which further provides capabilities of handling traffic. Lastly, NITCO is prepared and capable of managing traffic spikes resulting from emergency situations and has developed procedures for employees to follow during emergency situations.







Northwestern Indiana Telephone Co., Inc. (NITCO)  
Study Area 320800

### Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) NITCO, is in compliance with the requirement that voice service is no more than two standard deviations above the national average urban rate for voice service of \$49.51 established by the Wireline Competition Bureau. . NITCO's current total local end-user rate of \$17.15 (which includes a local fee of \$12.38, and state mandated fees of \$4.77 and surcharges and any EAS) is not above the standard deviation as specified in the USF/ICC Transformation Order.

Northwestern Indiana Telephone Co., Inc. (NITCO)  
Study Area Code: 320800

### Broadband Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (1) NITCO charges a residential rate of \$49.99 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$77.98, which is the reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau.

**LINE 3005 RATE OF RETURN DATA**

**REDACTED FOR PUBLIC INSPECTION**

Response to Line3010  
Northwestern Indiana Telephone Company, Inc.  
Study Area 320800

#### Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) Northwestern Indiana Telephone Company, Inc., (NITCO) provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.